



Missouri Coalition for the Environment

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Questions for EPA

June 18, 2013

Karl Brooks
Regional Administrator, Region 7
Environmental Protection Agency
11201 Renner Blvd.
Lenexa, KS 66219

RE: West Lake/Bridgeton Landfill Superfund Site

Dear Mr. Brooks:

The Missouri Coalition for the Environment (MCE) requests a meeting to go over questions submitted to the EPA dated May 23, 2013 and the questions below regarding the West Lake Landfill Superfund Site in St. Louis County, Missouri. MCE would like to meet with EPA staff before the June 25, 2013 public meeting scheduled at Pattonville High School so we can have an in-depth conversation regarding MCE and community concerns at West Lake Landfill. Will EPA meet with MCE before the June 25 meeting? If a meeting cannot be scheduled for June 25, will EPA please provide a written response to unanswered questions from the May 23 letter and questions listed below?

1. The EPA's 2008 Record of Decision on West Lake Landfill makes numerous assumptions about the inability of the radioactive wastes to move offsite based on current site conditions. The data also shows that the radioactive wastes will become more radioactive for the next 9,000 years. West Lake Landfill sits in a floodplain, in an urban area, and in a seismic zone; recently, several tornadoes have come close to touching down at the landfill; and there is a "subsurface smoldering event" in the landfill in close proximity. What guidance/statute/regulation does EPA use when determining long-term risk at Superfund Sites that will remain contaminated virtually forever?
 - a. The Japanese and United States governments never considered multiple events compromising nuclear reactors, like the earthquake and tsunami that hit Fukushima in Japan, crippled three reactors, and damaged safety systems. Has the EPA developed a risk assessment that considers multiple disasters impacting the spread of radioactive wastes at the West Lake Landfill?
2. Does the EPA contend that 8,700 tons of leached barium sulfate from Latty Avenue was mixed with 38,000 tons to 39,000 tons of "clean material" as stated in the Responsiveness Summary (page 13)?
3. How does the EPA explain levels of Radium-226 and Radium-228 outside of Operable Unit - 1? For example: The Responsiveness Summary from 2008 (page 3) states "only four wells exhibited a total radium concentration above the MCL of 5 picocuries per liter (pCi/l)" with the maximum reading



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being 6.33pCi/l. A map in the Groundwater Monitoring report dated December 14th, 2012 (page 84) displays 20 wells that show radium levels above 5pCi/l with PZ-101-SS reading 32.01pCi/l, which is outside of Area-1 and Area-2 of Operable Unit 1. With the increase in the concentration of Radium from the wells, how can the EPA continue to state that the levels of Radium being read are naturally occurring?

- a. Does naturally occurring Radium increase its radioactivity over time?
- b. Can the EPA explain the increase in the level of radium in the wells above 5 pCi/l?
4. Given that the radioactive wastes were dumped at West Lake 40 years ago and Dr. Criss's conclusion that the "radiologically-contaminated groundwaters have moved substantial lateral distances away from the original areas where the radwaste was dumped, and also have entered subjacent Mississippian bedrock," is it more likely that the levels of Radium-226 and Radium-228 are elevated because they are from the radioactive wastes that were dumped and therefore are not naturally occurring as the EPA currently concludes?
5. Besides the ASPECT plane and groundwater testing, is the EPA doing anything else (i.e. soil samples) to improve its understanding of the West Lake Landfill and the radioactive materials that are present?
6. Is the EPA conducting groundwater samples outside the West Lake Landfill? If no, why not? If no, how can the EPA claim the radioactive wastes have not moved off site? If yes, can the EPA provide the data?
7. How can the EPA conclude that the radioactive materials are contained based on the ASPECT plane, which only measured gamma radiation up to one foot, while the radioactive wastes are buried up to 15 feet deep and there is no liner to prevent groundwater contamination?
8. Is there a "red line" to trigger the removal of the radioactive wastes in context to the smoldering landfill event and its apparent progression north towards Area 1?
9. Has the EPA conducted community interviews of "impacted communities" in the last 10 years? If yes, does the EPA have evidence to support that community interviews were conducted? If yes, how have community interviews guided the EPA's response to community concerns? If no, does the EPA plan on conducting community interviews prior to the next Record of Decision?

Thank you for your consideration.

Ed Smith, MCE

Kathleen Logan Smith, MCE